

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: CASE NO. 20-11601

Connie A Mysliwiec aka Concetta Ann CHAPTER 13
Mysliwiec JUDGE LaShonda A. Hunt
Debtor(s).

OBJECTION TO CONFIRMATION OF PLAN FILED MAY 28, 2020

Nations Lending Corporation, an Ohio Corporation, hereinafter referred to as "Creditor", by and through its attorneys, DIAZ ANSELMO LINDBERG LLC, objects to the confirmation of the Chapter 13 plan for the following reasons:

1. This Court has jurisdiction pursuant to 28 U.S.C. § 1334 and the general orders of the Northern District of Illinois.
2. Venue is fixed in this Court pursuant to 28 U.S.C. § 1409.
3. This matter constitutes a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(L).
4. The debtor filed a petition for relief under Chapter 13 on May 28, 2020.
5. Nations Lending Corporation, an Ohio Corporation holds a mortgage secured by a lien on debtor's real estate commonly known as 25925 South White Oak Trail, Channahon, Illinois 60410.
6. The creditor filed a claim for pre-petition arrears in the amount of \$20,281.56. (See Proof of Claim 4-1 filed 6/25/2020.)
7. The Chapter 13 plan provides that the Debtor will pay Nations Lending Corporation, an Ohio Corporation arrears of \$15,477.00.

8. The Chapter 13 plan is not feasible as it will not complete within 5 years. Therefore, the plan does not comply with the requirements of 11 U.S.C. § 1322(d).
9. The Chapter 13 plan does not provide that the Creditor will be paid its secured claim of \$20,281.56. Therefore, the plan does not comply with 11 U.S.C. § 1325(a)(5)(B).

WHEREFORE, Creditor prays for entry of the attached Order Denying Confirmation of the Chapter 13 plan.

Nations Lending Corporation, an Ohio Corporation

/s/ Theodore Konstantinopoulos

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This law firm is deemed to be a debtor collector.